described by Ghoneimy do not describe file attachment, file download, or file classification indication and does it suggest any of these.

Nowhere does Ghoneimy teach or even suggest the classification of files and the classification indicator in a node for a file to be attached or downloaded.

B) Ghoneimy paragraph [0208] describes a tree of folders user interface where the user selects workflow steps to process. The tree of folders provides an improved user interface where related tasks are in a folder rather than a list of tasks. The folders are not a classification of the process steps or a classification of files.

Ghoneimy does not suggest or teach, as cited by the Examiner, the use of the tree of folders to classify a file to direct attachment or download of the classified file at a workflow step.

File upload and download

Ghoneimy addresses the attachment and download of files in paragraphs [0130]-[0133] where a file extension is related to a program to process the file on download and in paragraph [0057] citing the use of an NT file system. The present invention recognizes that file attachment and download are prior art. The present invention discloses a workflow for processing files where the file contents have functional significance independent of the file type and thus require means to distinguish the file content by a classification. The workflow disclosed by the present invention provides indication of the file classification for attachment or download so the appropriate workflow process step may be applied. Ghoneimy does not teach or suggest the use of workflow to process classified files or a workflow step to direct the attachment or download of a classified file. Ghoneimy does not teach or suggest the present invention. A broad reading of Ghoneimy cannot infer or imply what is not there.

Summary of the 103 Discussion

Claims 21-40 are rejected under 35 U.S.C. 103(a) as being anticipated by Ghoneimy et al U.S. Publication 20040078373 in view of Van Huben U.S. Patent 5,920,873.

Ghoneimy is an example of a prior art workflow and Van Huben is an example of a prior art PDM, Product Document Management system. The issues with both are discussed in the present invention specification paragraphs [0005] – [0009].

The power of workflow lies in the step by step system directed processing to implement a business process. Neither Ghoneimy nor Van Huben provide or suggest the implementation of a business process that includes the processing of files that are classified based on functional content using workflow or provide or suggest the functions required in the workflow, route, and route screens to support these business processes. Ghoneimy does not provide the required functions and the PDM capabilities of Van Huben do not provide the directed file classification and directed file upload or download and thus, the PDM functions

and screens are not applicable for a workflow for the users or systems that support these business processes that process classified files. Ghoneimy in view of Van Huben does not provide or suggest the present invention.

Detailed 103 Discussions

In reading the Examiner's citations, it appears that the cited paragraphs describe functions in Ghoneimy that <u>could be used to implement the present invention if the present invention were disclosed</u>. Ghoneimy is a generalized workflow and can be used to implement the present invention given a description of the present invention. However, even the broadest reading of Ghoneimy in view of Van Huben does not disclose or even hint at the present invention.

A) Per claims 21, 28, and 36, the examiner cites

1) classification of file in (pp 0055-0065) wherein Ghoneimy describes the implementation of that invention including an NT file system, NT file adapter, and SQL database. It further describes a database adapter and access by the workflow to store persistent data.

Ghoneimy does not describe classification of a file based on functional content nor providing a file classification indicator for attachment or download at a node. Ghoneimy does not disclose or suggest classified file types even in a broad reading of these paragraphs.

2) dividing the process into a first classified file attachment step in (pp 0079-0082) wherein Ghoneimy describes sub-processes, scripting, and public processes.

Ghoneimy does not describe a classified file attachment step or classified file download step. Ghoneimy does not describe file classification or associating a file classification with a step.

3) defining route steps that specify attachment or download of a file of a specified classification file type in (pp 0085) wherein Ghoneimy describes a script processor to interpret scripts to implement workflow functions.

Ghoneimy does not describe a route step that specified attachment or download or file classification specification nor is this suggested in any broad reading of this paragraph.

4) produce a route (pp 0085 -0089) wherein Ghoneimy describes a script processor and Java scripting capabilities to implement server side and client side functions.

Ghoneimy does not describe producing a route for processing classified files with steps for attaching or downloading classified files.

5) define a file of a classified file type (pp0065) wherein Ghoneimy describes model components used in the implementation of workflow nodes.

Ghoneimy does not describe files, file classification or any thing related to files or classification in this paragraph. Perhaps the cited paragraph is a typographical error.

6) execute the route and present the user with a screen to attach or download a classified file [0111] and [0116] wherein Ghoneimy describes in [0111] a Developer client used for both workflow development and workflow execution to testing and in [0116] a Target Area where a user can respond or alter the characteristics of a template.

Ghoneimy does not describe a screen for file to attach or download a classified file or even hint that such a screen.

7) Van Huben is a PDM system to organize design data where the data are in files and the PDM data organization classifies these files into trees and sub-trees of folders based on data content. Since the PDM screens provide the users full access, highly skilled operators are required to store and retrieve these files. The operators direct the PDM based on their experience and skill to implement business processes. Van Huben or prior art PDM do not direct the user to implement business processes through workflow screens that provide process steps that attach or download files of the classification appropriate for the process step. (col 4 lines 10-67;col 18 line 62 thru col 19 line 67) describe motivation for data aggregation across disparate data types for processing as a collection; and describes an automated means to track lines in a Bill of Material that require processing while leaving the other lines alone. Van Huben provides motivation for the application of data processing to the organization and processing of design data.

However, Van Huben does not describe or suggest the use of workflow as a possible application of data processing nor describe or suggest workflow with process steps for attachment or download of classified files. **Given the present invention**, one can look to Van Huben or similar PDM and envision how an existing PDM and existing workflow could be adapted to implement the present invention. But just given prior art workflow and PDM, the present invention is not apparent to one of ordinary skill.

B) Per claims 22 and 29, (pp 0065-0071) wherein Ghoneimy describes means to generate the user interface.

Ghoneimy does not disclose or suggest the attachment of files in a parent-child relationship.

C) Per claims 23, 31, and 40, (pp 0055-0071) wherein Ghoneimy describes the workflow structure and means to generate the user interface.

Ghoneimy does not disclose or suggest files with the same name be distinguishable.

D) Per claims 24 and 32, (col 43, lines 31-61;col 115 lines 8-18; col 117 lines 5-12) wherein Van Huben describes a program loop that processes files. The present invention is not claiming invention of program looping where the data items for each iteration are distinguishable. Van Huben does not describe a workflow where files are attached nor a workflow loop where files are attached and distinguishable. The prior art does not provide or suggest a workflow loop with file attachment where the files attached at each loop are distinguishable.

E) Per claims 25, 33, 34, and 39, (pp 0091-0111) wherein Ghoneimy describe user interface generation. Prior art workflow provide for conditional branches and parallel branching. While Ghoneimy and Van Huben do not anticipate the independent claims making these four dependent claims unique, the inventor has determined that these claims are not that significant and cancelled these claims.

F) Per claims 26 and 35, (pp 0065 -0079) wherein Ghoneimy describes structure of the workflow and generation of user screens.

Ghoneimy does not disclose or suggest a workflow screen that downloads a file based on file classification.

G) Per claims 27, 30, 37, and 38, (pp 0065 – 0071) wherein Ghoneimy describes structure of the workflow and generation of user screens.

Ghoneimy does not disclose or suggest a workflow screen that downloads a file based on a parent-child relationship. Ghoneimy does not describe file organization or parent-child relationship between files.

Conclusion

Van Huben is a prior art Product Document Management system with some automation and provides motivation for further automation. Van Huben does not describe or suggest or hint at the use of workflow for further automation. Van Huben does not describe or suggest or hint at dividing a business process that requires user interfaces into process steps. Van Huben does not describe or suggest or hint at business process steps where files have been classified based on the function of the content and workflow is used to process classified files with steps where file classification is specified and files are attached or downloaded based on classification.

Ghoneimy is a prior art workflow system. Ghoneimy does not describe or suggest or hint at workflow with process steps where file have been classified based on the function of the content and classified file are attached or downloaded. As observed by the Examiner, **given the present invention**, Ghoneimy can be further developed using **added functions** that are **not suggested or described** in Ghoneimy or Van Huben to implement the present invention. A broad reading of these prior art inventions does not describe, suggest, or hint at the present invention.

Neither Ghoneimy nor Van Huben nor any combination of these prior art functions provide or even suggest the implementation of a business process that processes classified files or the use of workflow to control such a business process or a route directed workflow system with route steps that provide system directed file classification and system directed attachment or download of classified files, the limitations of claims 21, 28, and 36.

Ghoneimy et al U.S. Publication 20040078373 in view of Van Huben U.S. Patent 5,920,873 does not anticipate the present invention.

The present invention provides a useful function and is uniquely different from the prior art. Please allow Claims 21-40.

Claims are grouped 21-24, 26, 27, 28-32, 35, and 36-38, 40 where claims 21, 28, and 36 are independent claims.

The attention and assistance of the examiner and the through examination are greatly appreciated.

A Word document file can be sent to the Examiner. Please send an e-mail to me at Ken.Ouchi@avidtecs.com and I will send you the file.

Please call me at 408-757-5862 after you have read this response so that we may discuss the Examiner's evaluation.

Respectfully submitted

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